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May 30, 2017

VIA ECF

Hon. William F. Kuntz, II
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Reply All Corp. v. Gimlet Media, Inc.*, 1:15-cv-04950-WFK-MDG

Dear Judge Kuntz:

I represent Plaintiff in the above-referenced matter. I write in response to Defendant's letter submitted earlier today. Defendant—who has recently stated it intends to re-open discovery—has not shown any real prejudice resulting from Plaintiff's proposed extension of time to file pre-motion conference letters, which Plaintiff requests only to accommodate its engagement of new counsel in this matter.

Our firm was only just engaged as Plaintiff's counsel on Friday, May 26, 2017. I immediately wrote to counsel for Defendant requesting her consent to Plaintiff's proposed three-week extension. Counsel for Defendant did not respond to my request, and instead sent a letter to Plaintiff's previous counsel, not copying our firm, regarding discovery. It was not until today that Counsel for Defendant responded. But Defendant shall not be prejudiced by the proposed three-week extension, particularly given its recent request to reopen discovery.

As such and as outlined in Plaintiff's letter submitted on May 26, 2017, Plaintiff respectfully requests an extension of time, from Wednesday, May 31, 2017, to Wednesday, June 21, 2017, for the deadline to file a letter requesting a pre-motion conference.

Respectfully Submitted,


John G. Balestriere

cc: Counsel of Record